

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KAMILAH JOLLY; DIEGO ALVAREZ-
MIRANDA EZPELETA; and VAUGHN BOBB-
WILLIS; individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

FURTHERED, INC. d/b/a LAWLINE, INC.,

Defendant.

Case No. 1:24-cv-06401-LJL

(consolidated with Case No. 1:24-cv-06709)

Hon. Lewis J. Liman

**NOTICE OF DEFENDANT’S MOTION TO DISMISS PLAINTIFFS’
SECOND AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the Declaration of Joshua Briones (and associated exhibits), the Declaration of Richard Hernandez (and associated exhibits), and the accompanying Memorandum of Law, Defendant FurtherEd, Inc. d/b/a Lawline (“Defendant”) hereby respectfully moves this Court, before the Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, at the United State Courthouse, Courtroom 15C, 500 Pearl Street, New York, NY 10007, for an order pursuant to Rules 12(b)(6) and 12(b)(1) of the Federal Rules of Civil Procedure dismissing the Plaintiffs’ Second Amended Class Action Complaint in this action and granting such further relief as the Court deems proper and just.

Dated: February 28, 2025

MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO, P.C.

By  _____
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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.



Joshua Briones